

<p style="text-align: center;">1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA</p> <p>STATE OF TEXAS,) Plaintiff,) VS.) ERIC H. HOLDER, JR., IN) HIS OFFICIAL CAPACITY AS) ATTORNEY GENERAL OF THE) UNITED STATES,) Defendant,) ERIC KENNIE, ET AL.,) Defendant-Intervenors,) THE TEXAS SATE CONFERENCE) OF NAACP BRANCHES, ET) AL.,) Defendant-Intervenors,) TEXAS LEAGUE OF YOUNG) VOTERS EDUCATION FUND, ET) AL.,) Defendant-Intervenors,) TEXAS LEGISLATIVE BLACK) CAUCUS, ET AL.,) Defendant-Intervenors,) VICTORIA RODRIGUEZ, ET) AL.,) Defendant-Intervenors.)</p> <p style="text-align: right;">CASE NO. 1:12-CV-00128 (RMC-DST-RLW) Three-Judge Court</p>	<p style="text-align: center;">3</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>1 2 3 FOR THE PLAINTIFF STATE OF TEXAS: Mr. Adam Aston 4 ATTORNEY GENERAL OF TEXAS Civil Medicaid Fraud Division 5 209 W. 15th Street Austin, Texas 78701 adam.aston@oag.state.tx.us 6 7 8 FOR THE DEFENDANTS ERIC H. HOLDER, ET AL.: Ms. Michelle McLeod 9 U.S. DEPARTMENT OF JUSTICE 1800 G Street, 7254 10 NWB - Room 7202 Washington, DC 20006 michelle.mcleod@usdoj.gov 11 12 13 RODRIGUEZ DEFENDANT-INTERVENORS: Ms. Nina Perales 14 110 Broadway, Suite 300 San Antonio, Texas 78205 nperales@maldef.org 15 16 17 ALSO PRESENT: MR. Luis Figueroa - Legislative Staff Attorney 18 MALDEF 110 Broadway, Suite 300 19 San Antonio, Texas 78205 lfigueroa@maldef.org 20 21 22 23 24 25</p>
<p style="text-align: center;">2</p> <p>1 ***** 2 ORAL DEPOSITION OF 3 GLENN BAYRON 4 JUNE 12, 2012 5 ***** 6 ORAL DEPOSITION OF GLENN BAYRON, produced as a 7 witness at the instance of the Defendants Eric H. Holder, 8 et al., and duly sworn, was taken in the above-styled and 9 numbered cause on Wednesday, June 12, 2012, from 10 12:28 p.m. to 2:23 p.m., before Tamara K. Chapman, CSR in 11 and for the State of Texas, reported by machine shorthand, 12 at the Omni, 9821 Colonnade Boulevard, San Antonio, Texas, 13 pursuant to the Federal Rules of Civil Procedure and the 14 provisions stated on the record or attached hereto. 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: center;">4</p> <p style="text-align: center;">I N D E X</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">PAGE</p> <p>APPEARANCES..... 2</p> <p>GLENN BAYRON</p> <p>EXAMINATION Examination By Mr. Aston 5</p> <p>CHANGES AND SIGNATURE..... 58</p> <p>SIGNATURE PAGE..... 59</p> <p>REPORTER'S CERTIFICATION..... 61</p> <p style="text-align: center;">E X H I B I T S</p> <p>NO. DESCRIPTION PAGE</p> <p>1 Notice (No Bates - 7 pages) 8</p> <p>2 SB 14 (no Bates - 17 pages) 16</p> <p>3 Defendant-Intervenor Southwest Voter Registration Education Project's Response to Plaintiff's First Request for Production (no Bates - 7 pages) 54</p>



<p style="text-align: center;">5</p> <p>1 GLENN BAYRON, 2 having been first duly sworn, testified as follows: 3 EXAMINATION 4 BY MR. ASTON: 5 Q. Good afternoon. 6 A. Hello. 7 Q. Once again, my name is Adam Aston. I represent 8 the State of Texas. Would you please state and then spell 9 your name for the record. 10 A. Glenn Bayron, G-L-E-N-N B-A-Y-R-O-N. 11 Q. Have you ever been deposed? 12 A. No. 13 Q. Have you ever seen a deposition? 14 A. Just the one I saw just prior to this. 15 Q. Are you suffering from any illness or taking any 16 medication that will affect your ability to provide 17 accurate answers to my questions? 18 A. No. 19 Q. You aware of anything else that might prevent you 20 from accurately answering my questions? 21 A. Okay. 22 Q. Go over a few things like we did for the 23 deposition this morning. Please answer audibly so the 24 reporter can take down your answers. A nod or a head 25 shake cannot be reported. Do you understand?</p>	<p style="text-align: center;">7</p> <p>1 A. Yes. 2 Q. And unless I indicate otherwise, when I use the 3 term "you" or "Mi Familia or "your organization" during 4 the questions in this deposition, that term includes the 5 Mi Familia Vota Education Fund and anyone acting on its 6 behalf. Do you understand? 7 A. Yes. 8 Q. Did you do any preparation for your deposition 9 today? 10 A. Yes. 11 Q. What did you do? 12 A. I met with the attorneys yesterday upon my 13 arrival in San Antonio and prior to that, reviewed some of 14 the materials related to the case that were made available 15 to me. 16 Q. When you say "materials," do you mean the 17 pleadings in this case? 18 A. I'm not exactly sure what the term of the 19 document is. I believe that looks a lot like the 20 document, the one that's next to you there. I believe 21 it's a notice. 22 Q. You said "the document." Did you only review one 23 document? 24 A. No. No, there was an additional document that I 25 believe was a summary of specific answers to questions</p>
<p style="text-align: center;">6</p> <p>1 A. Yes. 2 Q. If you don't understand my question or if you'd 3 like for me to speak slower at any time, please let me 4 know and I will do so. 5 A. Okay. 6 Q. Please wait until I finish my question to answer, 7 and I will try and wait until you finish your answers to 8 ask the next question. Okay? 9 A. Okay. 10 Q. Your lawyer may object to a question. Even if 11 she objects, unless she instructs you not to answer, 12 please do so. 13 A. Okay. 14 Q. Are you represented by counsel today? 15 A. Yes. 16 Q. And who is your counsel? 17 A. Nina Perales. 18 Q. Anyone else? 19 A. Luis Figueroa. 20 Q. And when did that representation begin? 21 A. I guess whenever Mi Familia Vota came on board 22 with the suit. I don't have an exact date. 23 Q. Do you understand that you have been designated 24 to provide testimony on behalf of the Mi Familia Vota 25 Education Fund today?</p>	<p style="text-align: center;">8</p> <p>1 that was submitted to Mi Familia Vota to my boss, Carlos 2 Duarte. 3 Q. Can you spell that name, please? 4 A. C A-R-L-O-S D-U-A-R-T-E. 5 Q. Did you meet with anyone else at Mi Familia in 6 order to prepare for this deposition? 7 A. No. 8 Q. Did you have any e-mail discussions or phone 9 conversations? 10 A. No. 11 (Exhibit 1 was marked.) 12 Q. (BY MR. ASTON) You've been handed what has been 13 marked Exhibit 1. Would you please review it and then 14 we'll discuss it briefly. 15 (Witness reviews document.) 16 Q. (BY MR. ASTON) Are you familiar with this 17 document? 18 A. Yes. 19 Q. And this is the one marked "Notice" -- 20 A. Correct. 21 Q. -- "of Intention to Take Deposition"? 22 A. (Witness nods.) 23 Q. You've been asked -- or I guess Mi Familia has 24 been asked to designate someone to testify as to 11 25 topics. Are you familiar with all 11 topics here?</p>



<p style="text-align: center;">9</p> <p>1 A. Yes.</p> <p>2 Q. And you've been designated to testify as to all</p> <p>3 of the topics?</p> <p>4 A. That is correct.</p> <p>5 Q. And you're prepared to testify --</p> <p>6 A. Yes.</p> <p>7 Q. -- as to all...</p> <p>8 Your preparations to testify as to these topics,</p> <p>9 anything in addition to what we've already discussed?</p> <p>10 A. No.</p> <p>11 Q. Look at Topic 6, please, on Page 2. Topic 6:</p> <p>12 Any policy making or advocacy-related work performed by or</p> <p>13 on behalf of Mi Familia Vota Education Fund regarding</p> <p>14 voter identification.</p> <p>15 A. To my knowledge, Mi Familia Vota Education Fund</p> <p>16 has not engaged in any specific advocacy-related work</p> <p>17 pursuant to this work.</p> <p>18 Q. Not just as to Senate Bill 14 or this current,</p> <p>19 but previously before?</p> <p>20 A. Correct. To my knowledge,</p> <p>21 Q. Does Mi Familia generally engage in</p> <p>22 policy-related activities such as these as to other topics</p> <p>23 perhaps?</p> <p>24 A. The Educational [sic] Fund, because if it's</p> <p>25 501(c)(3) status, is limited in its ability to engage in</p>	<p style="text-align: center;">11</p> <p>1 501(c)(4) element -- branch to the organization as well.</p> <p>2 Q. And what does that branch do?</p> <p>3 A. Currently that -- well, within Texas? Is that</p> <p>4 what you're referring to?</p> <p>5 Q. Yes.</p> <p>6 A. Okay. That branch is currently involved in</p> <p>7 organizing community groups along issues that are of</p> <p>8 importance to those groups and facilitating their</p> <p>9 involvement in the civic engagement process.</p> <p>10 Q. Now, might that include things other than</p> <p>11 election and voting-related --</p> <p>12 A. Yes.</p> <p>13 Q. -- activities.</p> <p>14 Do you know how many employees Mi Familia has?</p> <p>15 A. I believe at this point currently -- again,</p> <p>16 talking about the Texas operation total -- in total, about</p> <p>17 16 employees.</p> <p>18 Q. In Texas?</p> <p>19 A. Uh-huh.</p> <p>20 Q. And what is your role?</p> <p>21 A. I am the state coordinator.</p> <p>22 Q. And what do you do as the state coordinator?</p> <p>23 A. I work directly under the state director in</p> <p>24 managing and overseeing both the (c)(3) and the (c)(4)</p> <p>25 aspects of the organization. And I should probably</p>
<p style="text-align: center;">10</p> <p>1 public policy advocacy. Our mission primarily is related</p> <p>2 to promoting civic -- specific engagement in the Latino</p> <p>3 community through voter registration and information on</p> <p>4 citizenship classes as well as promoting voter</p> <p>5 mobilization.</p> <p>6 Q. Topic 8 on your list: Mi Familia Vota Education</p> <p>7 Fund's election-related activities, including but not</p> <p>8 limited to, driving voters to the polls, assistance with</p> <p>9 mail-in ballots and poll watching.</p> <p>10 Are those the sorts of activities that you're</p> <p>11 referring to?</p> <p>12 A. Among others, yes.</p> <p>13 Q. And the others would be like registration and</p> <p>14 voter education?</p> <p>15 A. Exactly.</p> <p>16 Q. And that would be Topic 7?</p> <p>17 A. Yes.</p> <p>18 Q. A few background questions on the organization</p> <p>19 itself. When was the organization founded?</p> <p>20 A. To be honest with you, I don't know. I believe</p> <p>21 it was in the early 2000s. I've only been with the</p> <p>22 organization since late 2011.</p> <p>23 Q. And the corporate structure of the organization,</p> <p>24 as you mentioned a moment ago, 501(c)(3); is that correct?</p> <p>25 A. That is correct. That is one aspect. There is a</p>	<p style="text-align: center;">12</p> <p>1 clarify that when I say the (c)(4), that I am, by</p> <p>2 definition, not talking about Mi Familia Vota Educational</p> <p>3 Fund.</p> <p>4 I supervise a voter registration coordinator and</p> <p>5 his team of canvass leads and canvassers.</p> <p>6 Q. Now, you mentioned a minute ago the (c)(4)</p> <p>7 portion has a different name. What is that name?</p> <p>8 A. Mi Familia Vota Texas.</p> <p>9 Q. Does the organization rely on volunteers?</p> <p>10 A. Yes.</p> <p>11 Q. Do you know about how many volunteers the</p> <p>12 organization would have in a given year?</p> <p>13 A. Since I've only been with the organization for</p> <p>14 about eight or nine months, I couldn't say in total. I</p> <p>15 know that depending on the activity. Currently, for</p> <p>16 example, we probably work with about 15 or 20 volunteers</p> <p>17 at any given time.</p> <p>18 Q. And what is the organization -- I think at this</p> <p>19 point we're going back to the Education Fund portion --</p> <p>20 A. Right.</p> <p>21 Q. -- their primary activities?</p> <p>22 A. Voter registration, voter education. And we will</p> <p>23 eventually be engaging in a get-out-the-vote. I guess</p> <p>24 "voter mobilization" is the term.</p> <p>25 Q. And where is -- where are they headquartered, the</p>



<p style="text-align: center;">13</p> <p>1 office?</p> <p>2 A. In Houston.</p> <p>3 Q. Is that the only Texas office?</p> <p>4 A. Yes.</p> <p>5 Q. And do they have offices in other states?</p> <p>6 A. Mi Familia Vota has offices in other states.</p> <p>7 Q. Do you know how many states?</p> <p>8 A. Yes.</p> <p>9 Q. How many?</p> <p>10 A. California, Colorado, Nevada, Arizona and</p> <p>11 Florida.</p> <p>12 Q. And does the Texas portion interact significantly</p> <p>13 with the others or are they generally independent?</p> <p>14 A. What do you mean by "significantly"?</p> <p>15 Q. That's a good question.</p> <p>16 Is it fair to say that each state sort of</p> <p>17 operates independently of the others with some supervision</p> <p>18 from maybe a national group?</p> <p>19 A. I believe perhaps "autonomously" is a better word</p> <p>20 than "independently." My boss interacts more with his</p> <p>21 peers among state directors, for example, on a regular</p> <p>22 basis than I would with the -- my peers who were</p> <p>23 coordinators. But I would say there is a regular amount</p> <p>24 of interaction among the state staffs.</p> <p>25 Q. And would you have an idea of how many employees</p>	<p style="text-align: center;">15</p> <p>1 Q. And what about grants from governmental agencies?</p> <p>2 A. I do not believe we receive grants from</p> <p>3 government entities.</p> <p>4 Q. Do you know how much money has been received from</p> <p>5 these private grants --</p> <p>6 A. No.</p> <p>7 Q. -- in the last year?</p> <p>8 A. No, I do not.</p> <p>9 Q. Has the organization made plans to assist voters</p> <p>10 with compliance with Senate Bill 14?</p> <p>11 A. We have -- I have not engaged in any specific</p> <p>12 conversations thus far related to any sort of, quote,</p> <p>13 what-if type scenarios if the passage of the law were to</p> <p>14 be permanent.</p> <p>15 Q. Are you aware of anyone else at Mi Familia making</p> <p>16 those plans?</p> <p>17 A. No.</p> <p>18 Q. So then is it fair to also say that no plans have</p> <p>19 been implemented, to your knowledge?</p> <p>20 A. To my knowledge, no plans have been implemented.</p> <p>21 Q. If it is implemented, will the organization</p> <p>22 educate voters about the requirements of Senate Bill 14?</p> <p>23 A. With serious reservations.</p> <p>24 Q. Why the reservations?</p> <p>25 A. Because the organization holds that the intent</p>
<p style="text-align: center;">14</p> <p>1 the entire organization would have?</p> <p>2 A. I could not guess. I do not know.</p> <p>3 Q. Would you consider Texas to be one of the larger</p> <p>4 staffs?</p> <p>5 A. I don't know.</p> <p>6 Q. Is Mi Familia a membership organization?</p> <p>7 A. No.</p> <p>8 Q. So they do not have individual members?</p> <p>9 A. Correct.</p> <p>10 Q. What is the annual budget for Mi Familia Vota</p> <p>11 here in Texas?</p> <p>12 A. I can only speak to the annual budget of</p> <p>13 Educational Fund. To my knowledge, I believe it is</p> <p>14 approximately \$700,000.</p> <p>15 Q. And that would be the Texas portion --</p> <p>16 A. Correct.</p> <p>17 Q. -- of the Education Fund?</p> <p>18 A. Yes. That would be the Mi Familia Vota</p> <p>19 Educational Fund budget.</p> <p>20 Q. How does the organization raise money?</p> <p>21 A. Through foundation grants and -- well, actually</p> <p>22 foundation grants are the only ones I am specifically</p> <p>23 aware of. I believe we may receive funding from SEIU, but</p> <p>24 I'm not sure. We do not have individual donor bases, to</p> <p>25 my knowledge.</p>	<p style="text-align: center;">16</p> <p>1 and impact of this bill are both detrimental and</p> <p>2 counterproductive to Latino citizen slash civic</p> <p>3 participation.</p> <p>4 Q. What will the organization do, how will they</p> <p>5 conduct that education?</p> <p>6 A. We will continue our efforts to inform eligible</p> <p>7 voters within the Latino community as to where they can</p> <p>8 vote; if necessary, how the process works in terms of</p> <p>9 registering to vote; and provide information on polling</p> <p>10 locations and rules and regulations.</p> <p>11 Q. Will the organization help voters obtain either</p> <p>12 the identification required or the underlying documents</p> <p>13 necessary to obtain the identification required by Senate</p> <p>14 Bill 14?</p> <p>15 A. We have not -- or I have not been involved in any</p> <p>16 conversations thus far that have talked about specific</p> <p>17 steps in helping people obtain identification documents.</p> <p>18 (Exhibit 2 was marked.)</p> <p>19 Q. (BY MR. ASTON) You have been given what has been</p> <p>20 marked as Exhibit No. 2. Would you please review it and</p> <p>21 we'll discuss it briefly.</p> <p>22 (Witness reviews document.)</p> <p>23 Q. (BY MR. ASTON) Are you familiar with this</p> <p>24 document?</p> <p>25 A. Yes.</p>



<p style="text-align: center;">17</p> <p>1 Q. And you're familiar with Senate Bill 14?</p> <p>2 A. Correct.</p> <p>3 Q. Have you read the bill?</p> <p>4 A. Not every word. I have glanced over it.</p> <p>5 Q. Have you read parts of it?</p> <p>6 A. I've read section headings, and I believe I</p> <p>7 understand the main points.</p> <p>8 Q. When did you first hear about the bill?</p> <p>9 A. In the fall, I believe.</p> <p>10 Q. Have you discussed the bill with anyone at</p> <p>11 Mi Familia?</p> <p>12 A. Yes.</p> <p>13 Q. With whom did you speak?</p> <p>14 A. My boss and one or two other employees, perhaps.</p> <p>15 Casual conversations with the other employees.</p> <p>16 Q. Would all these conversations have been with the</p> <p>17 16 employees here in Texas that you referred to earlier?</p> <p>18 A. Correct.</p> <p>19 Q. What did you talk about during those</p> <p>20 conversations?</p> <p>21 A. The nature of the bill, what we perceive to be</p> <p>22 its intent and its impact, both on, again, Latino voter</p> <p>23 participation and access as well as implications for our</p> <p>24 efforts to promote civic engagement among Latino voters in</p> <p>25 Texas.</p>	<p style="text-align: center;">19</p> <p>1 Secretary of State as well as voter registrars to</p> <p>2 undertake some efforts to educate the community in the</p> <p>3 event that Senate Bill 14 goes into law as to the new</p> <p>4 requirements?</p> <p>5 A. Insofar as that those efforts are not</p> <p>6 specifically described in the bill, at least at my current</p> <p>7 glancing of it, yes.</p> <p>8 Q. Page 9 starting on Line 13, please review</p> <p>9 Section 14 of the bill.</p> <p>10 (Witness reviews document.)</p> <p>11 A. Okay.</p> <p>12 Q. (BY MR. ASTON) Have you read this provision</p> <p>13 before?</p> <p>14 A. Yes.</p> <p>15 Q. So you're familiar with the list of acceptable</p> <p>16 photo identification documents?</p> <p>17 A. Correct.</p> <p>18 Q. Do you know what an election identification</p> <p>19 certificate is?</p> <p>20 A. Yes.</p> <p>21 Q. On Line 18.</p> <p>22 Describe, please, your understanding of what an</p> <p>23 election identification certificate --</p> <p>24 A. Line 18 is actually scratched out here. I'm</p> <p>25 sorry. Are we talking about page --</p>
<p style="text-align: center;">18</p> <p>1 Q. I'll talk to you a minute about a few of the</p> <p>2 provisions of the bill. Would you turn to Page 3, please.</p> <p>3 Section 5: Voter Identification Education.</p> <p>4 Have you read or reviewed this provision of the</p> <p>5 bill?</p> <p>6 MS. PERALES: Sorry, there were two</p> <p>7 paragraphs numbered 5, so he's just finding his way.</p> <p>8 MR. ASTON: That's quite all right.</p> <p>9 A. Yes, I'm sorry, your question was?</p> <p>10 Q. (BY MR. ASTON) If you're familiar with this</p> <p>11 provision of the bill, either because you've read it or</p> <p>12 you've discussed it with others?</p> <p>13 A. I'm just taking a minute to glance at the</p> <p>14 introductory paragraph to refresh my memory.</p> <p>15 Q. Sure.</p> <p>16 (Witness reviews document.)</p> <p>17 A. Okay.</p> <p>18 Q. (BY MR. ASTON) Had you read that provision</p> <p>19 before?</p> <p>20 A. I don't recall specifically reading this</p> <p>21 provision before.</p> <p>22 Q. Had you discussed it before, that you know of?</p> <p>23 A. Only perhaps in the context of the larger scope</p> <p>24 of the bill's impact.</p> <p>25 Q. Would you agree that this provision requires the</p>	<p style="text-align: center;">20</p> <p>1 Q. I'm on Page 9.</p> <p>2 A. I'm on Page 10.</p> <p>3 Q. I'm sorry.</p> <p>4 A. It is my understanding that this is a document</p> <p>5 that would be made available to eligible voters upon</p> <p>6 request at various state agencies, including Department of</p> <p>7 Public Safety offices and that this document currently</p> <p>8 does not exist.</p> <p>9 Q. If you will hold your place there on Page 9 but</p> <p>10 also turn to Page 13. Line 17 begins, Section 20:</p> <p>11 Election identification certificate.</p> <p>12 If you'd take a minute to familiarize yourself.</p> <p>13 (Witness reviews document.)</p> <p>14 A. Okay.</p> <p>15 Q. (BY MR. ASTON) Had you read that provision</p> <p>16 before?</p> <p>17 A. Not specifically. Word for word, no.</p> <p>18 Q. But had you discussed the election identification</p> <p>19 certificate provision?</p> <p>20 A. Yes.</p> <p>21 Q. Or the -- if not the provision itself but --</p> <p>22 A. I was aware that this proposed form of</p> <p>23 identification was part of this proposed legislation.</p> <p>24 Q. Turning back to Page 9. United States military</p> <p>25 identification cards. On Page 10, United States</p>

21

1 citizenship certificate and a U.S. passport. You agree
2 that those forms of identification are acceptable forms
3 under Senate Bill 14, correct?
4 A. I have never seen in my personal experience a
5 U.S. military identification card. The only type of
6 citizenship certificate that I'm familiar with are those
7 that are provided in the context of naturalization
8 ceremonies, and I'm a holder of a U.S. passport. Without
9 actually having seen the first two, going on the
10 assumption that they are legitimate documents, my answer
11 would be yes.

12 Q. You mentioned earlier that Mi Familia does not
13 have members but has employees and staff. Are you aware
14 of any of the employees or staff at your organization that
15 lack a photo ID required by Senate Bill 14 to vote?

16 A. Mi Familia Vota employees are not only U.S.
17 citizens but legal residents of the United States.

18 Q. In those 16?

19 A. Correct.

20 Q. Okay. Of those who are citizens and registered
21 to vote, are you aware of any of the staff or employees
22 that are registered but who do not have one of the photo
23 ID documents on that list?

24 MS. PERALES: You can answer if you know.

25 A. I do not know of any that do not, but -- that, to

22

1 me, is, you know, I -- I don't -- I haven't seen all of
2 their IDs.

3 Q. (BY MR. ASTON) Fair enough.

4 Does Mi Familia represent anyone else besides
5 the organization in this litigation?

6 A. Can you repeat -- can you expand on that? I'm
7 not exactly sure what I you mean by "represent."

8 Q. Mi Familia, as an organization, has entered this
9 lawsuit and -- on behalf of itself.

10 A. Uh-huh.

11 Q. Does it purport to be entering this lawsuit on
12 behalf of anyone else?

13 A. To my knowledge, no.

14 Q. Let's talk about Senate Bill 14. And if the
15 Court preclears that law, how does Mi Familia believe the
16 implementation of Senate Bill 14 will harm Mi Familia?

17 A. First and foremost, we are of the position that
18 our constituents, as eligible voters within the Latino
19 community, would be harmed; that the process and ability
20 for them to exercise their legal right to vote would be
21 hindered and obstructed and, therefore, by definition, our
22 work, which is designed to facilitate and help enable them
23 to exercise their voting rights more easily, would be
24 burdened and obstructed.

25 Q. Anything else?

23

1 A. No.

2 Q. You mentioned constituents. I guess that would
3 be distinct from members. But who does Mi Familia believe
4 to be its constituents?

5 A. The Latino community. We are -- our mission is
6 to promote civic engagement within the Latino community.

7 Q. Throughout --

8 A. In --

9 Q. -- the state in its entirety?

10 A. In -- well, currently we're operating only within
11 the confines of Harris County.

12 Q. But do you consider that your constituents are
13 the Latino and Hispanic community in Harris County or in
14 the state of Texas or something different?

15 A. Specifically Harris County. But conceptually,
16 throughout the state of Texas.

17 Q. Does Mi Familia register voters?

18 A. Yes.

19 Q. What percentage of the budget -- the annual
20 budget is dedicated to voter registration?

21 A. The (c)(3) budget as it stands now is dedicated
22 exclusively to our voter registration efforts at this
23 time.

24 Q. Does Mi Familia conduct voter education
25 activities?

24

1 A. Yes. And I should clarify that when I speak of
2 voter registration activities, I am including within that,
3 from a programmatic perspective, that voter education is
4 part of voter registration.

5 Q. So is it fair to say your organization does not
6 break down between registration and education activities?

7 A. We view voter education as part of the
8 registration process, as well as part of voter
9 mobilization process.

10 Q. That would include getting people to vote and
11 taking them to the polls?

12 A. If requested to do so.

13 Q. And so you would say all of those things you
14 would consider to be one -- they're not distinct functions
15 in your organization's view?

16 A. I would characterize them as complementary
17 functions.

18 Q. And other than -- well, would you say that for
19 those three basic functions, the registration, education,
20 and mobilization, that constitutes, combined, what
21 percentage of the budget?

22 A. Well, factoring in my staff time and that of the
23 state directors, that is pretty much 100 percent of what
24 we are doing in (c)(3) -- in the educational fund side.
25 That is what we do.



<p style="text-align: center;">25</p> <p>1 Q. Has Mi Familia hosted any speakers about voter ID 2 legislation, either SB 14 or previous legislation? 3 A. No, not to my knowledge. 4 Q. Has your organization produced any reports on 5 voter ID legislation? 6 A. No. 7 Q. Has it conducted any surveys? 8 A. No. 9 Q. Conducted any studies? 10 A. No. 11 Q. And again, just to be clear, that's not just for 12 Senate Bill 14, but that's previous voter ID legislation. 13 A. No. To my knowledge, no. 14 Q. Did your organization provide its staff with any 15 materials on voter ID during the 2011 legislative session? 16 A. Can you repeat that question again? I'm sorry. 17 Q. Sure. Did your organization provide its staff 18 with any materials, written documents, regarding voter ID 19 during the 2011 legislative session? 20 A. I came on board to Mi Familia Vota in my current 21 capacity in February of 2012. Any communications prior to 22 that related to this or any other issue before the Texas 23 legislature, I am unaware of. 24 Q. Did Mi Familia meet with any interest groups 25 during the legislative session or before regarding Senate</p>	<p style="text-align: center;">27</p> <p>1 discuss issues pertaining to voter registration, the 2 empowerment of our constituencies. And where our missions 3 coincide, we collaborate in discussions. But I do not 4 know of any specific meetings or strategy sessions of this 5 nature. 6 Q. And to your knowledge, no documents were traded 7 back and forth? Or no written materials? 8 A. In recent months we have received updates from 9 other organizations as far as the status of some of this 10 legislation. But it has been distributed in the context 11 of casual information exchange with no specific strategies 12 that I have been involved in. 13 Q. When you say "in recent months," are you 14 referring to maybe calendar year 2012? 15 A. During my tenure with the organization. 16 Q. Which began in February? 17 A. In my current position, yes. 18 Q. Mi Familia Vota Education Fund intervened with 19 other parties; is that correct? 20 A. I don't know what you mean by "intervene" -- oh, 21 do you mean in the context of this -- 22 Q. In this litigation, yes, sir. 23 A. My understanding is that the Mexican American 24 Legal Defense and Educational Fund is representing both 25 Mi Familia Vota and the Southwest Texas Voter Education</p>
<p style="text-align: center;">26</p> <p>1 Bill 14? 2 A. Can you clarify the parameters of what you are 3 calling the 2011 legislative session? 4 Q. The session would have been from January until, I 5 believe, June when they left. And before I would 6 certainly include the months certainly leading up to, 7 during the bill filing, and then the consideration. 8 A. To my knowledge, no. 9 Q. To your knowledge, has the organization met with 10 any of those groups about voter ID legislation in previous 11 years? 12 A. Prior to 2011? 13 Q. In earlier legislative sessions when other bills 14 were considered. 15 A. I do not know. My understanding is that 16 Mi Familia Vota Educational Fund is a relatively young 17 organization in the state of Texas. So I do not think so, 18 no. 19 Q. Did any groups provide your organization's staff 20 with written materials or documents regarding voter ID 21 legislation, say between the legislative session, during 22 the session, and now? 23 A. Mi Familia Vota Educational Fund interacts 24 regularly with a variety of other (c)(3) organizations 25 within the state of Texas that have similar missions. We</p>	<p style="text-align: center;">28</p> <p>1 Project. This is my understanding. 2 Q. Has Mi Familia met with Southwest Voter 3 Registration Education Project? 4 A. Not to my knowledge, no. 5 Q. Have they met with the two individual women? 6 A. No. 7 Q. So you're not aware of any conversations or 8 e-mails or exchange of documents between Southwest Voter 9 and Mi Familia with regard to Senate Bill 14 or this 10 litigation? 11 A. Correct. 12 THE WITNESS: Do you think we might be able 13 to take a five-minute restroom break? 14 MR. ASTON: We certainly can. 15 THE WITNESS: Okay. 16 Q. (BY MR. ASTON) I do have one more question on 17 this section, if we could. 18 A. Sure. 19 Q. The claims of Southwest Voter and Mi Familia, to 20 your knowledge, are they based upon the same legal and 21 factual contentions? 22 A. We challenge the intent of this bill. We believe 23 it is detrimental of the voter interests of the Latino 24 community and other minority communities. We see its 25 impact as very negative for eligible voters in this state.</p>

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1 Q. But are you aware of any of the legal or factual
2 contentions that you're making -- your organization is
3 making that are independent from those of Southwest Voter?

4 MS. PERALES: You can answer, if you know.

5 A. I do not know of anything that specifically would
6 distinguish us from the position in the Southwest Voter
7 Education Project.

8 MR. ASTON: Can we go off the record?

9 (Break.)

10 Q. (BY MR. ASTON) Did you personally speak with
11 anyone at the Department of Justice about Senate Bill 14?

12 A. No.

13 Q. Did Mi Familia speak, to your knowledge, with the
14 Department of Justice about Senate Bill 14?

15 A. To my knowledge, no.

16 Q. And that would include during the legislative
17 session, afterwards during the preclearance proceedings,
18 and during this litigation?

19 A. Correct.

20 Q. And that would include phone conversations,
21 e-mails and letter, and any other correspondence?

22 A. To my knowledge, correct.

23 Q. Does Mi Familia contend that Senate Bill 14 will
24 have the effect of denying or abridging Hispanics' and
25 Latinos' right to vote on account of race, color, or

30

1 membership in a language minority group?

2 A. Yes, this is our contention.

3 Q. What is the basis for that contention?

4 A. The historical framework of minority voting in
5 the State of Texas; the demonstrated relative disadvantage
6 that the Latino community has in being able to produce the
7 identification documents outlined in the bill; various
8 structural limitations, including cost,
9 location/accessibility, to obtaining such documents.

10 Q. Anything else?

11 A. Again, we feel that it is the intent of a
12 majority of Texas legislators to curtail and impede the
13 full voting power of the Latino and other minority
14 communities through passage of this bill. We believe that
15 this presents added undue burden and obstruction to the
16 free exercise of eligible voting among Latinos and our
17 ability as an organization to complete our mission.

18 Q. You mentioned a moment ago something to the
19 effect that you believe Hispanics and Latinos might be
20 less likely to have photo IDs as listed in Senate Bill 14.
21 Is it your contention that they are less likely than
22 others to have each of those or some of those photo IDs?

23 A. I cannot speak to the specific statistical
24 percentages for each form of identification. But overall,
25 I believe it has been demonstrated that the Latino

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1 community in general has a lower likelihood of meeting
2 these newer, more stringent requirements for voting, and
3 that, therefore, by definition, it is a violation of the
4 Voting Rights Act.

5 Q. Is it possible that Latinos have an ID such as a
6 passport at a greater or higher rate than other Texas
7 citizens?

8 A. I have no empirical information regarding the
9 percentage of Latinos who hold passports vis-à-vis other
10 ethnic groups.

11 Given what is required to obtain a passport,
12 first and foremost, cost. In addition to that, limited
13 number of U.S. passport agencies in the state of Texas,
14 and the need for, at times, interurban transportation to
15 obtain one, I would think that it is an additional burden
16 on an identifiable percentage of the Latino community. I
17 have no specific numbers in mind.

18 Q. I just want to make sure you have an opportunity
19 to provide all of the answers that you wish to provide.
20 Is that the entire version of your organization's evidence
21 that Senate Bill 14 will have the effect of denying or
22 abridging Hispanics and Latinos' right to vote?

23 A. I think that when we look at not only issues of
24 effect, but given how the law or, rather, the bill came
25 into being, the historical framework of voting vis-à-vis

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1 minority voting in Texas among other states governed by
2 the Voting Rights Act, the timing of the legislation,
3 given the larger national discussion of voting and voter
4 fraud that is particularly targeted to the Latino
5 community presumptively, I feel that it is a reasonable
6 connection to think that there is sufficient evidence of
7 purposeful intent to disempower the Latino voting group.

8 Q. We will definitely talk about purpose in a
9 minutes. But again, I don't want to cut you off short.

10 As far as effect goes, is there anything else
11 that you wanted to add?

12 A. No.

13 Q. Does Mi Familia contend that Senate Bill 14 will
14 have the effect of denying or abridging African-Americans'
15 right to vote on account of race, color or membership in a
16 language minority group?

17 A. We are not empowered to speak for the
18 African-American community; however, we feel that many of
19 the barriers that are faced by Latinos in this bill are
20 similarly faced by African Americans.

21 Q. What is the basis for that contention? Is it
22 everything you've said before, or are there other things
23 you'd like to add?

24 A. I think everything's been said. If I had to
25 emphasize one concept, it would be history.



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<p style="text-align: center;">33</p> <p>1 Q. Does Mi Familia contend that Senate Bill 14 will</p> <p>2 have the effect of denying or abridging Asian-Americans'</p> <p>3 right to vote on account of race, color or membership in a</p> <p>4 language minority group?</p> <p>5 A. Again, I cannot speak to specific issues related</p> <p>6 to the Asian community. Our focus is working with the</p> <p>7 Latino community in representing the legitimate interests</p> <p>8 of the Latino community.</p> <p>9 Q. Has Mi Familia conducted any studies or any</p> <p>10 surveys on the effect of Senate Bill 14 on minority</p> <p>11 voters?</p> <p>12 A. No.</p> <p>13 Q. Is Mi Familia familiar with polls regarding</p> <p>14 support for voter ID legislation?</p> <p>15 A. I am not specifically familiar with individual</p> <p>16 polls. I have not seen any specific reports of that</p> <p>17 nature.</p> <p>18 Q. Is your organization aware of polls showing that</p> <p>19 the majority of Texans support a photographic ID</p> <p>20 requirement to vote regardless of their political</p> <p>21 affiliation?</p> <p>22 A. Again, I have not seen any specific polling data</p> <p>23 related to that question; however, I will say that the</p> <p>24 popularity of the legislation is irrelevant, as far as we</p> <p>25 view it.</p>	<p style="text-align: center;">35</p> <p>1 A. In the context of indigent Latinos, we view that</p> <p>2 this bill would be a detriment to their ability to</p> <p>3 exercise the legitimate right to vote.</p> <p>4 Q. Do you believe that disabled voters are more</p> <p>5 likely than the average voter to lack a form of</p> <p>6 identification required by Senate Bill 14?</p> <p>7 A. I do not know.</p> <p>8 Q. Do you believe that rural voters are more likely</p> <p>9 than the average voter to lack a form of identification</p> <p>10 required by Senate Bill 14?</p> <p>11 A. Given what I know about the 70-some-odd counties</p> <p>12 within the State of Texas, assuming a good portion of them</p> <p>13 are rural in nature that do not have departments of public</p> <p>14 safety as offices that would be issuers of some of the IDs</p> <p>15 in question here, I would think that, yes, the rural</p> <p>16 population is at a specific disadvantage. And within that</p> <p>17 context, the Latino rural population is at an even larger</p> <p>18 disadvantage.</p> <p>19 Q. Do you believe that young voters are more likely</p> <p>20 than the average voter to lack a form of identification</p> <p>21 required by Senate Bill 14?</p> <p>22 A. I think that particularly since student IDs have</p> <p>23 been specifically excluded from the list of eligible</p> <p>24 acceptable forms of identification in this bill, that that</p> <p>25 would put youth at a higher rate of burden and being</p>
<p style="text-align: center;">34</p> <p>1 Q. Are you aware of any polls showing that the</p> <p>2 majority of Texans support a photographic ID requirement</p> <p>3 to vote regardless of their race?</p> <p>4 A. Can you repeat the question, please?</p> <p>5 Q. Sure. Are you aware of any polls showing that</p> <p>6 the majority of Texans support a photographic ID</p> <p>7 requirement to vote regardless of their race?</p> <p>8 A. No.</p> <p>9 Q. Are you aware of any polls showing that the</p> <p>10 majority of Texans support a photographic ID requirement</p> <p>11 to vote, regardless of their membership in a language</p> <p>12 minority?</p> <p>13 A. No.</p> <p>14 Q. Does Mi Familia believe that elderly voters are</p> <p>15 more likely than the average voter to lack a form of</p> <p>16 identification required by Senate Bill 14?</p> <p>17 A. I believe that in the context that I've outlined,</p> <p>18 meaning as it impacts the Latino community, the barriers</p> <p>19 that I have referenced are present for the elderly</p> <p>20 community within the Latino community.</p> <p>21 Beyond that, I am not prepared to speak on a</p> <p>22 larger scale about the impact on the elderly.</p> <p>23 Q. Does Mi Familia believe that indigent voters are</p> <p>24 more likely than the average voter to lack a form of</p> <p>25 identification required by Senate Bill 14?</p>	<p style="text-align: center;">36</p> <p>1 prevented from voting.</p> <p>2 Again, specifically as it pertains to the Latino</p> <p>3 community, that that burden is even more present.</p> <p>4 Q. And now, we're going to shift from currently</p> <p>5 having to obtaining the IDs. Do you believe that indigent</p> <p>6 voters are less likely than nonindigent voters to be able</p> <p>7 to obtain the underlying documents and then to obtain a</p> <p>8 form of identification required under Senate Bill 14?</p> <p>9 A. Can you repeat the question again? I'm sorry.</p> <p>10 MR. ASTON: Sure.</p> <p>11 Could you read it back?</p> <p>12 (The requested material was read.)</p> <p>13 A. I would think that indigent voters are presented</p> <p>14 with a wide variety of challenges, but I cannot pretend to</p> <p>15 be able to enumerate them.</p> <p>16 Q. (BY MR. ASTON) What about the elderly, do you</p> <p>17 believe that they are less likely than the nonelderly to</p> <p>18 be able to obtain the documents and then an ID?</p> <p>19 A. I feel like we've -- that this question sounds</p> <p>20 like a question you've asked previously or is it just --</p> <p>21 is there a specific wording maybe that's maybe different?</p> <p>22 Have we not covered how the elderly perhaps are impacted</p> <p>23 or what I perceive is how the elderly are impacted in this</p> <p>24 bill? I want to be able to answer your question</p> <p>25 completely, but it's -- I'm -- it's starting to feel like</p>



<p style="text-align: center;">37</p> <p>1 maybe I'm mishearing things, but I've heard this question</p> <p>2 before.</p> <p>3 Q. I don't believe I've asked the question before.</p> <p>4 You may have -- you've certainly discussed the elderly in</p> <p>5 other contexts. But I guess the question is, do you</p> <p>6 believe that the elderly are less likely than nonelderly</p> <p>7 to be able to obtain the documents they would need and</p> <p>8 then to obtain --</p> <p>9 A. I don't know.</p> <p>10 Q. -- the photo ID?</p> <p>11 A. I don't know.</p> <p>12 Q. What about rural voters?</p> <p>13 A. I think my previous statement about limitations</p> <p>14 in the rural area, particularly those given the absence of</p> <p>15 the issuing offices --</p> <p>16 Q. You're referring to the DPS office?</p> <p>17 A. Correct.</p> <p>18 -- present challenges. And given the good</p> <p>19 number of Latinos who live in the rural area, I think the</p> <p>20 challenges are presented to them specifically.</p> <p>21 Q. Okay. Finally, young voters. Do you believe</p> <p>22 that they are less likely than non-young voters to be able</p> <p>23 to obtain the underlying documents and then to obtain a</p> <p>24 photo ID?</p> <p>25 A. I think I can say with some certainty that in the</p>	<p style="text-align: center;">39</p> <p>1 A. I don't recall.</p> <p>2 Q. Can Mi Familia identify any Texas registered</p> <p>3 voter who does not currently have one of the types of</p> <p>4 photo ID required by Senate Bill 14?</p> <p>5 A. No.</p> <p>6 Q. Does Mi Familia know how many Texas registered</p> <p>7 voters lack the documents that would be necessary to</p> <p>8 obtain a state-issued photo ID?</p> <p>9 A. Can you repeat that, please.</p> <p>10 MR. ASTON: Would you read it back, please.</p> <p>11 (The requested material was read.)</p> <p>12 A. I don't have a specific number in my head, no.</p> <p>13 Q. (BY MR. ASTON) Can Mi Familia identify any Texas</p> <p>14 registered voter who does not have the documents necessary</p> <p>15 to get a state-issued photo ID?</p> <p>16 A. No.</p> <p>17 Q. Has Mi Familia done any studies of photo ID</p> <p>18 possession by Texas registered voters?</p> <p>19 A. No.</p> <p>20 Q. Has Mi Familia conducted any surveys of photo ID</p> <p>21 possession by Texas registered voters?</p> <p>22 A. No.</p> <p>23 Q. You mentioned at the beginning that Mi Familia</p> <p>24 Texas is affiliated -- or not affiliated, perhaps, but</p> <p>25 there are other states in which Mi Familia overall --</p>
<p style="text-align: center;">38</p> <p>1 Latino, young eligible voters are at a disadvantage in</p> <p>2 terms of as it relates to what's proposed in this bill.</p> <p>3 Q. Specifically as to obtaining the documents</p> <p>4 necessary and then obtaining an ID?</p> <p>5 A. You say the documents necessary and then</p> <p>6 obtaining the ID as if they are two different --</p> <p>7 Q. Well, for example, obtaining the birth</p> <p>8 certificate that you would then use to obtain the photo</p> <p>9 ID.</p> <p>10 A. I don't know.</p> <p>11 Q. Does Mi Familia know how many Texas registered</p> <p>12 voters lack one of the forms of photo ID that is required</p> <p>13 by Senate Bill 14?</p> <p>14 A. I recall seeing some data about particularly the</p> <p>15 percentage of Latinos versus the larger population. And I</p> <p>16 seem to recall that Latinos do not have the identification</p> <p>17 at a higher percentage than other groups.</p> <p>18 Q. Do you know what information you're referring to</p> <p>19 when you say you've seen some information?</p> <p>20 A. I can't -- I don't remember the specific report.</p> <p>21 I want to say it may be the information that was produced</p> <p>22 leading up to -- or actually, no. I believe it might have</p> <p>23 been a newspaper article, but I don't recall.</p> <p>24 Q. Do you know if that information discussed or</p> <p>25 included all types of photo ID listed by Senate Bill 14?</p>	<p style="text-align: center;">40</p> <p>1 A. Yes.</p> <p>2 Q. -- operates?</p> <p>3 A. Yes.</p> <p>4 Q. Is Georgia one of those states?</p> <p>5 A. No.</p> <p>6 Q. Is Indiana one of those states?</p> <p>7 A. No.</p> <p>8 Q. Is Mi Familia aware that both of those states</p> <p>9 have photo identification laws currently in place?</p> <p>10 A. We are aware. I don't have any specific details</p> <p>11 as to the nature of those laws.</p> <p>12 Q. But Mi Familia is aware that there are other</p> <p>13 states that have photo identification requirements to</p> <p>14 vote?</p> <p>15 A. Yes.</p> <p>16 Q. That have -- that are in place currently?</p> <p>17 A. Yes.</p> <p>18 Q. Let's talk for a few minutes about purpose. Does</p> <p>19 Mi Familia contend that Senate Bill 14 was enacted with a</p> <p>20 discriminatory purpose?</p> <p>21 A. Yes.</p> <p>22 Q. What is the basis for that contention?</p> <p>23 A. I believe I outlined several of the points in a</p> <p>24 related question earlier, but I will recall the main</p> <p>25 points.</p>



<p style="text-align: center;">41</p> <p>1 Q. Before you do, you're referring to your answer to</p> <p>2 the, I believe, initial question, does Mi Familia contend</p> <p>3 that Senate Bill 14 was enacted -- will have a</p> <p>4 discriminatory effect.</p> <p>5 A. Yes.</p> <p>6 Q. That answers what you're referring to?</p> <p>7 A. Yes. But just to be on the safe side, I want to</p> <p>8 make sure that I restate for purposes of clarity.</p> <p>9 First and foremost, the historical framework</p> <p>10 that put Texas under the jurisdiction of the Voting Rights</p> <p>11 Act and the National Voter Registration Act.</p> <p>12 Subsequently, the manner in which the legislation evolved</p> <p>13 through both Houses of the Texas State Legislature in</p> <p>14 which any and all attempts among minority legislators to</p> <p>15 submit amendments or other recommended changes to the</p> <p>16 legislation were rejected.</p> <p>17 The focus on a supposed crisis of voter fraud</p> <p>18 that had has yet to be demonstrated by the authors of this</p> <p>19 bill.</p> <p>20 The focus on a supposed crisis of voter</p> <p>21 impersonation that has yet to be demonstrated by the</p> <p>22 authors of this bill and the supporters of this bill.</p> <p>23 The correlation between the timing of its evolution and</p> <p>24 other national political dialogues in other states related</p> <p>25 to voter identification, particularly as they impact the</p>	<p style="text-align: center;">43</p> <p>1 offered by a member of the legislature who was a member of</p> <p>2 a minority group was rejected?</p> <p>3 A. I have read anecdotally that that is the case. I</p> <p>4 cannot name specific legislators nor can I name specific</p> <p>5 amendments.</p> <p>6 Q. You mentioned how the bill evolved through both</p> <p>7 Houses. I think you followed that with the minority</p> <p>8 amendment discussion. Is there anything else about how</p> <p>9 the bill evolved through the Houses that Mi Familia</p> <p>10 contends constituted discriminatory purpose?</p> <p>11 A. I have no specific information to suggest</p> <p>12 additional items related to that.</p> <p>13 Q. The last one, national political dialogue. What</p> <p>14 are you referring to?</p> <p>15 A. I'm drawing a connection to what we see happening</p> <p>16 in other states as far as voter ID laws being proposed in</p> <p>17 areas of the country where there are high percentages of</p> <p>18 Latino voters and where the issue of Latino eligibility to</p> <p>19 participate in the voting process appears to be put on the</p> <p>20 defensive. Without demonstrating cause.</p> <p>21 Q. Is there anything else, before we move on to a</p> <p>22 different topic, that you would like to add to your</p> <p>23 contention as to the discriminatory purpose that</p> <p>24 Mi Familia believes underlies Senate Bill 14?</p> <p>25 A. No.</p>
<p style="text-align: center;">42</p> <p>1 Latino community.</p> <p>2 And the indisputable importance of the fact that</p> <p>3 we're about to embark on a presidential election.</p> <p>4 Q. I want to be absolutely clear that we got all of</p> <p>5 that.</p> <p>6 MR. ASTON: Would you mind reading it back</p> <p>7 to make sure that he's satisfied that he didn't leave</p> <p>8 anything out.</p> <p>9 (The requested material was read.)</p> <p>10 Q. (BY MR. ASTON) That covers it?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. First you discussed the history that got</p> <p>13 us within the Voting Rights Act. How does -- we're all</p> <p>14 aware of the history, but how is it that -- how is it that</p> <p>15 Mi Familia contends -- what are the contentions -- that</p> <p>16 what happened long ago in the past continues to inform</p> <p>17 what the legislature does today?</p> <p>18 A. I think the one similarity that comes to mind is</p> <p>19 that people who are otherwise eligible to vote are being</p> <p>20 presented with undue and unnecessary burdens to do so.</p> <p>21 That's the best and simplest way I can draw that</p> <p>22 correlation.</p> <p>23 Q. You mentioned minority amendments.</p> <p>24 A. (Witness nods.)</p> <p>25 Q. Is it your contention that every amendment</p>	<p style="text-align: center;">44</p> <p>1 Q. Does Mi Familia contend that preventing voter</p> <p>2 fraud was not a purpose of Senate Bill 14?</p> <p>3 A. We challenge the assertion that voter fraud</p> <p>4 exists on any sizable, significant or otherwise noticeable</p> <p>5 level at all, absent any proof to the contrary.</p> <p>6 Q. Is it your contention that the members of the</p> <p>7 legislature could not have thought preventing voter fraud</p> <p>8 was one of the purposes of this bill?</p> <p>9 A. Again, I struggle with the invocation of the term</p> <p>10 "voter fraud" in this conversation given the absence of</p> <p>11 demonstrable data to show that it is even an issue.</p> <p>12 Q. Do you contend that the Texas legislature</p> <p>13 intended to harm poor people by passing Senate Bill 14?</p> <p>14 A. I do not see anything in this bill that</p> <p>15 demonstrates that they are representing the interest --</p> <p>16 interests, rather, of poor people.</p> <p>17 Q. I think that's at least slightly different. Do</p> <p>18 you believe that they intended to harm poor people when</p> <p>19 they passed the bill?</p> <p>20 A. I can't speak to what is in the individual hearts</p> <p>21 and minds of every legislator who voted in favor of this</p> <p>22 bill. I have not seen anything to indicate that they are</p> <p>23 taking into consideration the impact on a wide number of</p> <p>24 citizens -- or, rather, a wide cross-section of citizens,</p> <p>25 including poor people, as far as their ability to exercise</p>



<p style="text-align: center;">45</p> <p>1 the right to vote.</p> <p>2 Perhaps it depends on how you define "harm."</p> <p>3 Q. Does Mi Familia contend that the Texas</p> <p>4 legislature intended to harm young people by passing</p> <p>5 Senate Bill 14?</p> <p>6 A. Again, inasmuch as a -- what I would call a</p> <p>7 blatant disregard for the importance of preserving the</p> <p>8 civil rights of young people, particularly Latinos.</p> <p>9 Q. Does Mi Familia contend that the Texas</p> <p>10 legislature intended to harm elderly people by passing</p> <p>11 Senate Bill 14?</p> <p>12 A. I think my answer is probably the same.</p> <p>13 Q. Does Mi Familia contend that the Texas</p> <p>14 legislature intended to harm rural voters in passing</p> <p>15 Senate Bill 14?</p> <p>16 A. Again, in the disregard over impact? Yes.</p> <p>17 Q. And does Mi Familia contend that the Texas</p> <p>18 legislature intended to harm urban voters by passing</p> <p>19 Senate Bill 14?</p> <p>20 A. I think particularly in the context of limiting</p> <p>21 the legitimate voting rights of Latinos and other minority</p> <p>22 groups who tend to be overrepresented in urban areas, yes.</p> <p>23 Q. I just want to make clear that I have it right.</p> <p>24 As to poor, young, elderly and rural, you contend that it</p> <p>25 was a disregard for their interests?</p>	<p style="text-align: center;">47</p> <p>1 Q. (BY MR. ASTON) Does Mi Familia support the idea</p> <p>2 that one should have to register to vote?</p> <p>3 A. Yes.</p> <p>4 Q. And does the organization support the idea to</p> <p>5 make sure that those who show up to vote are registered?</p> <p>6 A. Yes. We believe that there are already laws in</p> <p>7 place to ensure that.</p> <p>8 Q. And should Texas make sure that when someone</p> <p>9 shows up to vote, he or she is who he or she says he or</p> <p>10 she is?</p> <p>11 A. Yes. And, again, we believe that there are</p> <p>12 already laws in place to ensure that.</p> <p>13 (Brief disturbance.)</p> <p>14 (Discussion off the record.)</p> <p>15 Q. (BY MR. ASTON) Do you know how many other states</p> <p>16 have photo ID requirements in place at this time?</p> <p>17 A. No.</p> <p>18 Q. Are you aware that the United States Supreme</p> <p>19 Court considered Indiana's photo ID law in a case called</p> <p>20 Crawford versus Marion County Election Board?</p> <p>21 A. I am not aware of the specifics of that case.</p> <p>22 Q. But you're aware that it exists?</p> <p>23 A. Only insofar that you referenced Indiana's voter</p> <p>24 ID law some time ago.</p> <p>25 Q. Before today had you heard that the Supreme Court</p>
<p style="text-align: center;">46</p> <p>1 A. Purposeful disregard.</p> <p>2 Q. Is there any other evidence or anything else</p> <p>3 Mi Familia contends other than that disregard?</p> <p>4 A. I want to emphasize that by stating "purposeful"</p> <p>5 I am demonstrating a perception on our part that there is</p> <p>6 intent, yes. That is my point.</p> <p>7 Q. Can you name any members of the Texas legislature</p> <p>8 that Mi Familia contends acted with a discriminatory</p> <p>9 purpose in supporting and voting for Senate Bill 14?</p> <p>10 A. I cannot name specific names, no. We are</p> <p>11 inferring that by voting for the bill in support of the</p> <p>12 bill -- in other words, a yay -- that all of the</p> <p>13 intentions that I have previously expressed hold true for</p> <p>14 every legislator or who did so.</p> <p>15 Q. So it's Mi Familia's contention that everyone who</p> <p>16 voted to support this bill did so with the discriminatory</p> <p>17 intent that we've been discussing?</p> <p>18 A. At a minimum insofar as described in my use of</p> <p>19 the term "purposeful disregard."</p> <p>20 Q. Do you know if any members of the legislature who</p> <p>21 are a member of a minority group voted for the bill?</p> <p>22 A. I don't have a list in my head of all of the</p> <p>23 legislators who voted for the bill.</p> <p>24 MR. ASTON: Go off the record a minute.</p> <p>25 (Break.)</p>	<p style="text-align: center;">48</p> <p>1 had reviewed a photo ID law a few years ago?</p> <p>2 A. I have a vague recollection but I don't have -- I</p> <p>3 don't recall any specifics.</p> <p>4 Q. How would Mi Familia define voter fraud?</p> <p>5 A. Not being a lawyer, I would define voter fraud as</p> <p>6 someone who is ineligible to vote either attempting to or</p> <p>7 actually voting.</p> <p>8 Q. Would you also include an eligible voter who</p> <p>9 votes by saying that he or she is someone else and votes</p> <p>10 for someone else?</p> <p>11 A. Do you mean -- by saying that, do you mean voter</p> <p>12 impersonation?</p> <p>13 Q. Yes. Either in person or by collecting mail-in</p> <p>14 ballots, filling them out for someone else, and submitting</p> <p>15 them?</p> <p>16 A. I would say yes. But given the -- again, going</p> <p>17 back to a previous statement about the absence of any</p> <p>18 significant evidence to suggest that either voter fraud or</p> <p>19 voter impersonation is a problem in the state of Texas, I</p> <p>20 don't see the relevance.</p> <p>21 Q. Following up on your most recent answer, and it's</p> <p>22 an answer that you've given a couple of other times, do</p> <p>23 you believe Texas should have to wait until it discovers a</p> <p>24 significant amount of in-person voter fraud before the</p> <p>25 legislature enacts a bill designed to prevent that fraud?</p>



<p style="text-align: center;">49</p> <p>1 A. First, I would suggest that Texas already has 2 mechanisms in place to prevent voter fraud in the current 3 books. And if there were going to be any justification 4 for adding undue burden on the electorate, particularly 5 the Latino electorate, to address any sort of purported 6 problem with either voter fraud or voter impersonation, 7 that it is reasonable to expect that the proponents of 8 such a law demonstrate that the problem exists in the 9 first place.</p> <p>10 Q. You just mentioned that Mi Familia believes there 11 are currently laws in place designed to prevent in-person 12 voter fraud. Is that a fair characterization of something 13 that you -- of one of the things you just said in that 14 previous answer?</p> <p>15 A. In the larger context of voter fraud in general, 16 yes, I believe that the current Texas statutes that are 17 designed to implement our election laws are sufficient.</p> <p>18 Q. What I'm wondering, what I'm asking, is that 19 Mi Familia asserts there is not currently evidence of 20 voter fraud but that we already have laws on the books 21 designed to prevent that fraud. Mi Familia contends that 22 because there is not this fraud, Texas should not be 23 allowed to enact Senate Bill 14. My question is, does 24 Mi Familia contend that the other laws that are currently 25 in place designed to prevent fraud should not have been</p>	<p style="text-align: center;">51</p> <p>1 I'll refer back to my comments about its impact directly 2 on the -- on Texas' role in the Voting Rights Act. I 3 believe it is regressive. I believe it hinders the 4 legitimate rights of eligible Latino voters.</p> <p>5 Q. Do you believe that a law requiring one to 6 vote -- I'm sorry -- requiring one to register in advance 7 of election day serves -- has those same concerns?</p> <p>8 A. I think it would depend on the specific aspects 9 of the requirements and limitations on when and how one 10 can register. The concept of registering in and of itself 11 is a value-neutral concept. But it cannot be seen as such 12 without a context. And so, therefore, I would state that 13 for me to fully answer the question, you would have to 14 give me the context and requirements under which a person 15 could legally register to vote.</p> <p>16 Q. How about the requirements currently in place in 17 Texas that require you to register weeks in advance of an 18 election?</p> <p>19 A. Going on the assumption -- and this is an 20 assumption -- that those requirements are applied equally 21 across constituents, in and of itself, registration, one 22 could argue that there pros and cons for a shortened or 23 long -- lengthened time frames. But in and of itself, 24 registration applied equally across to its citizens in and 25 of itself is not a hindrance.</p>
<p style="text-align: center;">50</p> <p>1 enacted?</p> <p>2 A. You'd have to give me a specific law before I can 3 speak about it. I can't answer --</p> <p>4 Q. Well, I guess I would ask you, the laws that 5 you're referring to when you say -- you referred to laws 6 we have in place designed to prevent voter fraud. Maybe 7 let's start there.</p> <p>8 What laws are you referring to?</p> <p>9 A. I cannot enumerate for you every single law on 10 the books that relates to voting or the elections process. 11 But Mi Familia Vota in its role as an organization that 12 promotes civic engagement, specifically voter 13 registration/education, abides by the laws.</p> <p>14 We have some issues with some of the more recent 15 laws, particularly those pertaining to what we perceive as 16 burdensome requirements placed on those who seek to 17 register voters, but we're in compliance with the laws. 18 I've come here today specifically prepared to speak about 19 the detrimental impact and the intent behind that impact 20 on Senate Bill 14. I cannot speak specifically about any 21 other legislation individually.</p> <p>22 Q. How about as a collective whole? Is it your 23 contention that what we have in place is proper but Senate 24 Bill 14 goes too far, or something else?</p> <p>25 A. I believe Senate Bill 14 moves us backwards. And</p>	<p style="text-align: center;">52</p> <p>1 Q. What about the requirement that you show up to 2 the poll with a form of an identification?</p> <p>3 A. I believe that the voter registration certificate 4 currently fulfills that requirement.</p> <p>5 Q. And requiring them to keep it -- requiring a 6 voter not to lose it and to bring it with him or her to 7 the polls?</p> <p>8 MS. PERALES: Objection to the extent it 9 mischaracterizes the current law, which provides for a 10 number of forms of identification beyond the voter 11 certificate.</p> <p>12 MR. ASTON: Sure.</p> <p>13 Q. (BY MR. ASTON) You're not required to take the 14 voter registration certificate. You can bring other forms 15 that people might have.</p> <p>16 A. (Witness nods.)</p> <p>17 Q. But you're required to show up to the polls with 18 an identification of some sort, whether it's the one that 19 they send you when you register or it's one that you have 20 otherwise?</p> <p>21 A. Correct. And going on the assumption, again, 22 that the vote -- the mechanism for registering to vote 23 which produces the voter registration certificate is made 24 available to all constituencies and communities. And that 25 is acceptable.</p>



<p style="text-align: center;">53</p> <p>1 I'm not clear -- well, I'll leave it at that.</p> <p>2 Q. Does Mi Familia believe laws like we've just been</p> <p>3 discussing, requiring one to register and requiring one to</p> <p>4 present an identification of some sort at the poll, are</p> <p>5 laws designed to prevent voter fraud?</p> <p>6 MS. PERALES: You can answer if you know.</p> <p>7 A. Beyond the purpose of implementing a legitimate</p> <p>8 election, Mi Familia Vota is not in a position to</p> <p>9 speculate on the motivation -- specific motivations of the</p> <p>10 State of Texas in terms of any specific regulation related</p> <p>11 to voting, whether that's the registration process, long</p> <p>12 or short, or the specific requirements that are -- that</p> <p>13 one needs to abide by to go and vote.</p> <p>14 Q. (BY MR. ASTON) Would Mi Familia agree that such</p> <p>15 requirements would make it harder for one to commit voter</p> <p>16 fraud?</p> <p>17 A. Are you referring to the current requirements in</p> <p>18 place?</p> <p>19 Q. The current requirements in place that we've been</p> <p>20 discussing, the registration requirement and the</p> <p>21 presentation of --</p> <p>22 A. So beyond -- not those related to SB 14?</p> <p>23 Q. Not SB 14. Those currently that are in place</p> <p>24 that we've been discussing the last few minutes,</p> <p>25 requirements such as those. Would you agree they make it</p>	<p style="text-align: center;">55</p> <p>1 (Witness reviews document.)</p> <p>2 A. Okay.</p> <p>3 Q. (BY MR. ASTON) Have you ever seen this document?</p> <p>4 A. Some of the talking points, or bullet items,</p> <p>5 rather, ring a bell, but I don't know if -- I don't recall</p> <p>6 seeing this specific e-mail, if that's what you're asking.</p> <p>7 Q. And remind us again, the name in bold, Carlos</p> <p>8 Duarte --</p> <p>9 A. Duarte.</p> <p>10 Q. -- Duarte, I'm sorry -- what is his position at</p> <p>11 Mi Familia?</p> <p>12 A. Texas state director.</p> <p>13 Q. About a third of the way down the page, do you</p> <p>14 see the four bullet points?</p> <p>15 A. Yes. That first one begins: The voter</p> <p>16 suppression law, et cetera?</p> <p>17 Q. Yes. Bullet point No. 3, the second piece of</p> <p>18 that.</p> <p>19 A. "Proponents of voter suppression laws have no</p> <p>20 evidence to support those claims" --</p> <p>21 Q. Starting with "meanwhile."</p> <p>22 A. "Meanwhile at least nine people around the</p> <p>23 country have been denied their right to vote because of</p> <p>24 these laws."</p> <p>25 Yes.</p>
<p style="text-align: center;">54</p> <p>1 harder for one to commit voter fraud?</p> <p>2 A. I would argue at face value that that is</p> <p>3 specifically why there is no need for SB 14.</p> <p>4 Q. Which gets us to the question I asked sort of at</p> <p>5 the beginning of this line. Is it your contention that</p> <p>6 there would need to be some or substantial or a great deal</p> <p>7 of additional voter fraud already discovered before Texas</p> <p>8 could enact a law designed to prevent that fraud?</p> <p>9 MS. PERALES: Objection to the extent that</p> <p>10 it suggests that there has been voter fraud discovered to</p> <p>11 date.</p> <p>12 You may answer.</p> <p>13 A. Where I struggle with this is because I -- I am</p> <p>14 not aware of any such voter fraud problem to begin with,</p> <p>15 which fuels my contention -- and perhaps I should take</p> <p>16 this opportunity to reinforce that contention -- that</p> <p>17 there is a demonstrated intent on the part of the Texas</p> <p>18 legislators who voted in favor of this legislation, and</p> <p>19 the absence of any evidence of the kinds of voter fraud</p> <p>20 and voter impersonation that get discussed, about intent</p> <p>21 to curtail and limit the legitimate voting power of the</p> <p>22 Latino community.</p> <p>23 (Exhibit 3 was marked.)</p> <p>24 Q. (BY MR. ASTON) Please take a minute to review</p> <p>25 what's been marked as Exhibit 3.</p>	<p style="text-align: center;">56</p> <p>1 Q. Okay. Yes. It says: Meanwhile, at least nine</p> <p>2 people around the country have been denied their right to</p> <p>3 vote because of these laws.</p> <p>4 Does Mi Familia have any evidence or any -- are</p> <p>5 they aware of anything about those nine people?</p> <p>6 A. I am unaware about this specific item.</p> <p>7 Q. Is Mi Familia aware of any other people in any</p> <p>8 state in which there is currently a photo ID law in place</p> <p>9 that have not been allowed to vote in 2010 or 2012 or 2008</p> <p>10 as a result of not having a photo identification?</p> <p>11 A. I have no information about any specific cases</p> <p>12 that have been brought to my attention.</p> <p>13 Q. So Mi Familia is not aware of any voter in any of</p> <p>14 those states?</p> <p>15 A. I am not aware. Insofar as I am speaking for</p> <p>16 Mi Familia Vota, I am limited, given the amount of time</p> <p>17 I've been with the organization. And so I don't -- I'm</p> <p>18 not aware of. So to my knowledge, no, I don't know.</p> <p>19 MS. PERALES: And then just to point out for</p> <p>20 the record, the text that you're discussing is part of an</p> <p>21 e-mail that's going to Mr. Duarte at Mi Familia.</p> <p>22 MR. ASTON: That is correct.</p> <p>23 Q. (BY MR. ASTON) To your knowledge, did Mi Familia</p> <p>24 receive that e-mail and do any investigation as to those</p> <p>25 nine people or any others?</p>



<p style="text-align: center;">57</p> <p>1 A. I am unaware of any details related to that.</p> <p>2 MR. ASTON: That's all I have.</p> <p>3 MS. PERALES: Do you have anything?</p> <p>4 MS. McCLEOD: No, nothing.</p> <p>5 MS. PERALES: I reserve my questions for the</p> <p>6 time of trial.</p> <p>7 We are done.</p> <p>8 THE WITNESS: Okay.</p> <p>9 MR. ASTON: You are finished.</p> <p>10 THE WITNESS: Thank you. Do I return these</p> <p>11 documents to you?</p> <p>12 MS. PERALES: Everything with a sticky on it</p> <p>13 goes to the court reporter.</p> <p>14 THE REPORTER: You want a copy, right, of</p> <p>15 the transcript?</p> <p>16 MS. McCLEOD: Yes, I would like a copy of</p> <p>17 the transcript.</p> <p>18 THE REPORTER: What about you, Ms. Perales,</p> <p>19 would you like a copy of the transcript?</p> <p>20 MS. PERALES: I think Dechert has a standing</p> <p>21 order, and so I'm with them.</p> <p>22 (THE DEPOSITION CONCLUDED AT 2:23 P.M.)</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: center;">59</p> <p>1 SIGNATURE PAGE</p> <p>2</p> <p>3 I, GLENN BAYRON, have read the foregoing</p> <p>4 deposition and hereby affix my signature that same is true</p> <p>5 and correct, except as noted above.</p> <p>6</p> <p>7 _____</p> <p>8 GLENN BAYRON</p> <p>9</p> <p>10 THE STATE OF _____)</p> <p>11 COUNTY OF _____)</p> <p>12 Before me, _____, on this</p> <p>13 day personally appeared GLENN BAYRON, known to me (or</p> <p>14 proved to me under oath or through _____) (description of identity card</p> <p>15 or other document)) to be the person whose name is</p> <p>16 subscribed to the foregoing instrument and acknowledged to</p> <p>17 me that they executed the same for the purposes and</p> <p>18 consideration therein expressed.</p> <p>19 Given under my hand and seal of office this</p> <p>20 _____ day of _____, 2012.</p> <p>21</p> <p>22 _____</p> <p>23 NOTARY PUBLIC IN AND FOR</p> <p>24 THE STATE OF _____</p> <p>25 COMMISSION EXPIRES: _____</p>
<p style="text-align: center;">58</p> <p>1 CHANGES AND SIGNATURE</p> <p>2 PAGE LINE CHANGE REASON</p> <p>3 _____</p> <p>4 _____</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p> <p>25</p> <p style="text-align: center;">GLENN BAYRON</p>	<p style="text-align: center;">60</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE DISTRICT OF COLUMBIA</p> <p>3)</p> <p>4 STATE OF TEXAS,)</p> <p>5)</p> <p>6 Plaintiff,)</p> <p>7)</p> <p>8 VS.)</p> <p>9)</p> <p>10 ERIC H. HOLDER, JR., IN)</p> <p>11 HIS OFFICIAL CAPACITY AS)</p> <p>12 ATTORNEY GENERAL OF THE)</p> <p>13 UNITED STATES,)</p> <p>14)</p> <p>15 Defendant,)</p> <p>16)</p> <p>17 ERIC KENNIE, ET AL.,)</p> <p>18)</p> <p>19 Defendant-Intervenors,)</p> <p>20)</p> <p>21 THE TEXAS STATE CONFERENCE)</p> <p>22 OF NAACP BRANCHES, ET) CASE NO. 1:12-CV-00128</p> <p>23 AL.,) (RMC-DST-RLW)</p> <p>24) Three-Judge Court</p> <p>25 Defendant-Intervenors,)</p> <p>26)</p> <p>27 TEXAS LEAGUE OF YOUNG)</p> <p>28 VOTERS EDUCATION FUND, ET)</p> <p>29 AL.,)</p> <p>30)</p> <p>31 Defendant-Intervenors,)</p> <p>32)</p> <p>33 TEXAS LEGISLATIVE BLACK)</p> <p>34 CAUCUS, ET AL.,)</p> <p>35)</p> <p>36 Defendant-Intervenors,)</p> <p>37)</p> <p>38 VICTORIA RODRIGUEZ, ET)</p> <p>39 AL.,)</p> <p>40)</p> <p>41 Defendant-Intervenors.)</p>



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1 REPORTER'S CERTIFICATION
2 DEPOSITION OF GLENN BAYRON
3 JUNE 12, 2012

4 I, Tamara K. Chapman, Certified Shorthand Reporter in
5 and for the State of Texas, hereby certify to the
6 following:

7 That the witness, GLENN BAYRON, was duly sworn by the
8 officer and that the transcript of the oral deposition is
9 a true record of the testimony given by the witness;

10 That the deposition transcript was submitted on
11 _____ to the witness or to the attorney for
12 the witness for examination, signature and return to me by
13 _____;

14 That the amount of time used by each party at the
15 deposition is as follows:

16 MR. ASTON - 1:40

17 MS. McLEOD - 0:00

18 MS. PERALES - 00:00

19 That pursuant to information given to the deposition
20 officer at the time said testimony was taken, the
21 following includes counsel for all parties of record:

22 Mr. Adam Aston - FOR THE PLAINTIFF STATE OF TEXAS

23 Ms. Michelle McLeod - FOR THE DEFENDANTS ERIC H.

24 HOLDER, ET AL.

25 Ms. Nina Perales - RODRIGUEZ DEFENDANT-INTERVENORS

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1 That \$ _____ is the deposition officer's charges
2 to the Plaintiff for preparing the original deposition
3 transcript and any copies of exhibits;

4 I further certify that I am neither counsel for,
5 related to, nor employed by any of the parties or
6 attorneys in the action in which this proceeding was
7 taken, and further that I am not financially or otherwise
8 interested in the outcome of the action.

9 Certified to by me this 14th day of June, 2012.

10
11 

12 Tamara K. Chapman, Texas CSR #7248

13 Expiration Date: 12/31/12

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